

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

Blitman Saratoga LLC,

Case No. 20-23177 (RDD)

Debtor.
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**DECLARATION OF JAMES GOREN IN SUPPORT OF THE
RETENTION OF GOLDBERG WEPRIN FINKEL GOLDSTEIN LLP
AS BANKRUPTCY COUNSEL FOR THE DEBTOR**

James Goren declares the following under penalties of perjury pursuant to 28
U.S.C. § 1746:

1. At the time of the commencement of this Chapter 11 case, my late brother, Alex, and I were beneficial members of Saratoga Goren Trust, holder of a 50% equity interest in the Debtor, Blitman Saratoga LLC.

2. I respectfully submit this Declaration in connection with the Debtor's application to retain Goldberg Weprin Finkel Goldstein LLP as its attorneys in his mater,

3. As disclosed in the Declaration of Kevin J. Nash filed in support of the proposed retention, GWFG received a payment in the sum of \$20,000 plus \$2,000 for the filing fee of \$1,717 and noticing expenses.

4. Goren Bros. Limited Partnership, which is owned by my brother Alex's estate and me, funded this payment to the Debtor as capital and not as a loan. On behalf of Goren Bros. Limited Partnership, my brother Alex's estate, and myself, this will confirm that we nevertheless waive any possible right to seek reimbursement from the Debtor relating to the payment.

5. Goren Bros. Limited Partnership, Alex's estate and I have separate counsel and we have been advised, and hereby acknowledge that GWFG is to be engaged in this Chapter 11 case solely to represent the interests of the Debtor and shall not represent us or the Debtor's equity holders in connection with any possible matter. I further expressly acknowledge that GWFG owes a duty of undivided loyalty to the Debtor only.

Dated: New York, New York
March 8, 2021

/s/ James Goren